In re Application of MAGARAM et al.
Serial No. 09/332,459

REMARKS

The Office action has been carefully considered. The Office action rejected claims 1, 3-9, 11-28, and 31-37 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,430,542 to Moran ("Moran"). Applicants respectfully disagree.

Please note that in previous Office actions certain claims were erroneously referred to by the incorrect numbers. In particular, due to an error in the original specification, claim 29 was inadvertently skipped and is, thus, not pending and never has been pending. A listing of the claims is presented (though no amendments are made at present) that reflect the true and correct numbering and show the current status as well as language that reflects all previous amendments. All remarks below refer to the true and correct claim numbers.

Applicants thank the Examiner for the interview held (by telephone) on March 9, 2005. During the interview, the Examiner and applicants' attorney discussed the claims with respect to the prior art. The essence of applicants' position is incorporated in the remarks below.

Prior to discussing reasons why applicants believe that the claims in this application are clearly allowable in view of the teachings of the cited and applied references, a brief description of the present invention is presented.

The present invention is generally directed toward a financial or other planning system and method in which hierarchically arranged objects are created and maintained to form a plan. The hierarchical arrangement enables objects to be dependent on other objects, while within the objects are fields that can be related to other fields, *e.g.*, dates, dollar amounts, interest rates and so on. Significantly,

once the user establishes one or more hierarchical dependencies, the user of the system and method need not be concerned with the dependencies and/or relationships among objects and fields, but rather may simply select elements and enter data for those elements, and thereafter let the objects of the system and method handle the dependencies. Thus, unlike simple programming techniques, a user may simply respond to questions via a user interface, fill in information and/or make selections related to the plan. The system may then write the proper information into the hierarchically arranged objects for the user, and may manage the relationships for the user. A planning engine may run a simulation based on the data in the objects.

For example, a user may choose to enter a home mortgage balance due that represents a total dollar amount owed on a home. Then, the user may enter a second piece of information such as an amount for a monthly savings deposit that represents an amount of money that the user intends to save each month in a bank account. With these two inputted data stores in place, the user may then choose to enter an additional input that defines a hierarchical relationship between the first and second data stores such that a value in the second data store is at least partially based on the first data store as a result of the hierarchical relationship. One example of a hierarchical relationship may be only depositing the savings amount in the bank account each month once the mortgage balance drops below a specified balance. Another example may be depositing a first amount of savings in a bank account each month at a first level until the savings balance reaches a threshold balance and then applying a maximum amount of funds toward the

mortgage balance. In any case, once established, the user need not be concerned with the hierarchical relationships if the user chooses to change values associated with the underlying objects.

The combination of hierarchical objects relationships and relative field values allows a great deal of flexibility in creating what may be a very complex data system, which can then be used to calculate the results of the user's financial plan over time, as well as making it fairly straightforward for the user to make changes to and update a plan. Moreover, via simple interaction with the user interface, a user can selectively disable objects and/or fields, which automatically disables additional objects and fields that are dependent on the directly disabled ones. This facilitates the running of various "what-if" type simulations, to determine the expected consequences of various possible actions.

Note that the above description is for example and informational purposes only, and should not be used to interpret the claims, which are discussed below.

Turning to the claims, independent claim 1 recites a computer-readable medium having computer-executable instructions, comprising, receiving input of a value corresponding to a first field of a first object that maintains plan data, receiving additional input corresponding to a second field of a second object that maintains plan data, receiving input that defines a hierarchical relationship between the first and second objects such that a value in the second field is at least partially based on the first field as a result of the hierarchical relationship, developing a plan by running a simulation on objects that maintain the plan data including the first and second objects, receiving input of a new value for the first field, and developing

a new plan by running a simulation on objects that maintain the plan data, including the first and second objects, in which in the new plan, the new value changes the information in the second field.

The Office action rejected claim 1 as anticipated by Moran. More specifically, the Office action contends that Moran teaches receiving input of a value corresponding to a first field of a first object that maintains plan data. Column 16, lines 25-35 of Moran is referenced. Further, the Office action contends that Moran teaches receiving additional input corresponding to a second field of a second object that maintains plan data. Column 20, lines 20-40 of Moran is referenced. Still further, the Office action contends that Moran teaches receiving input that defines a hierarchical relationship between the first and second objects such that a value in the second field is at least partially based on the first field as a result of the hierarchical relationship. Column 10, lines 47-60 of Moran is referenced. Further yet, the Office action contends that Moran teaches developing a plan by running a simulation on objects that maintain the plan data including the first and second objects. Column 21, line 62 to column 23, line 55 of Moran is referenced. Finally, the Office action contends that Moran teaches receiving input of a new value for the first field, and developing a new plan by running a simulation on objects that maintain the plan data, including the first and second objects, in which in the new plan, the new value changes the information in the second field. Again, column 16, lines 25-35 of Moran is referenced. Applicants respectfully disagree.

Moran teaches, generally, a financial planning system that allows an advisor to take advantage of certain dependencies between input data, such as, for example, an inheritance triggered by the death of someone or an annual contribution to a savings fund on a person's birthday. In particular, column 20, lines 20-52 detail a method by which a first data entry consists of one or more monthly expenses incurred by a person. A second data entry corresponds to a date of death of this person. After death, this person is no longer going to incur monthly expenses and the monthly expenses drop to zero upon the date of death based on the predetermined relationship between the monthly expenses data store and the date of death data store.

However, this relationship between the first and second data entries is not described anywhere in Moran as adjustable or user-accessible. Instead, Moran goes into great detail to describe the ability of the program to allow for an adjustment to all other data stores, such as monthly expenses, the income of other's around the deceased, and other investment goal assumptions. Additionally, the original relationship between the first and second entries in the method of Moran described above is not inputted by the user. Furthermore, Moran does not teach in any capacity being able to input a relationship between two data stores.

In contrast, claim 1 recites receiving input that defines a hierarchical relationship between the first and second objects. Thus, in the method of claim 1, a user may define a hierarchical relationship between the first and second objects by inputting data. In this manner, the relationship itself is definable and/or adjustable as opposed to merely manipulating the data entry fields surrounding the

relationship as is the case in Moran. Simply put, Moran does not teach receiving input that defines a hierarchical relationship between the first and second objects.

Another key difference between Moran and the recitations of claim 1 is that the method recited in claim 1 provides for receiving three different inputs regarding a single relationship within the plan data. Claim 1 recites receiving input of a value corresponding to a first field of a first object, receiving additional input corresponding to a second field of a second object, and receiving input that defines a hierarchical relationship between the first and second objects. The method taught by Moran does not encompass receiving these inputs. Contrarily, Moran merely teaches a method of receiving inputs corresponding to data for a first data store and a second data store. However, all subsequent data entries are directed toward either entering data for other data stores (*i.e.* not the first or the second described here) or are directed toward changes the data in the first and second data stores. Nowhere in the teachings of Moran is there disclosed a method or mechanism for inputting a hierarchical relationship between the first and second objects.

For at least the foregoing reasons, applicants submit that claim 1 is allowable over the prior art of record.

Applicants respectfully submit that dependent claims 3-9, 11-16, and 34 by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 1 and consequently includes the recitations of independent claim 1. As discussed above, Moran, fails to disclose the recitations of claim 1 and therefore these claims are also allowable over the prior art of record. In addition to

the recitations of claim 1 noted above, each of these dependent claims includes additional patentable elements.

For example, claim 16 recites receiving input information that includes synchronizing plan elements with data from another program. The Office action contends that this recitation is taught by Moran's disclosure of receiving input from a user interface. Column 10, lines 60-65 of Moran is referenced. Applicants respectfully disagree. A user interface, such as a keyboard or a mouse, is clearly not the same as another program. Even if one were to construe a user interface as being controlled by a driver program, the driver program certainly is not cognizant of financial plan elements and thus cannot possibly be used in synchronizing plan elements with data from another program as recited in claim 16. For at least this additional reason, applicants submit that claim 16 is allowable over the prior art of record.

Turning to the next independent claim, claim 17 recites in a computer system, a method of organizing information related to a plan, comprising, providing access to a limited number of objects to a user, each object having fields therein for maintaining plan information, receiving first user input information including a value associated with a first field of a first object, and receiving second user input information associated with a second field of a second object, the second input information specifying a relationship of the second field with the first field, disabling at least one object, and developing a plan including running a simulation that excludes each disabled object.

The Office action rejected claim 17 (erroneously referred to as claim 18 in the Office action) as anticipated by Moran. More specifically, the Office action contends that Moran teaches each recitation in claim 17 and cites the same rationale as was previously cited with respect to the rejection of claim 1. Applicants respectfully disagree.

As discussed above, Moran teaches, generally, a financial planning system that allows an advisor to take advantage of certain dependencies between input data. In particular, column 20, lines 20-52 detail a method by which a first data entry is one or more monthly expenses incurred by a person. A second data entry corresponds to a date of death of this person. Because this person is no longer going to incur monthly expenses, the monthly expenses drop to zero upon the date of death. However, this relationship between the first and second data entries is not described in Moran as adjustable or user-accessible. Additionally, the original relationship between the first and second entries in the method of Moran described above is not inputted by the user nor is this relationship able to be changed in any manner.

In contrast, claim 17 recites receiving second user input information associated with a second field of a second object, the second input information specifying a relationship of the second field with the first field. Thus, in the method of claim 17, a user may define a relationship between the first and second objects by inputting data. In this manner, the relationship itself is adjustable as opposed to only the related data entry fields as is the case in Moran. Simply put, Moran does not teach receiving input that defines a relationship between the first and second

objects. Applicants submit that claim 17 is allowable over the prior art of record for at least the foregoing reasons.

Applicants respectfully submit that dependent claims 18-19 and 35, by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 17 and consequently includes the recitations of independent claim 17. As discussed above, Moran fails to disclose the recitations of claim 17 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 17 noted above, each of these dependent claims includes additional patentable elements.

Turning to the next independent claim, claim 20 recites a system for outputting a plan, comprising, a user interface for presenting a limited number of plan objects to a user and for receiving data for a first field of a first plan object and data for a second field of a second plan object, the data of the second field having a value linked to the data of the first field via a hierarchical relationship between the first and second objects, the user interface further providing a mechanism that allows plan objects to be selectively disabled, and a planner engine for developing a plan by running a simulation on plan objects while excluding any disabled plan objects.

The Office action rejected claim 20 (erroneously referred to as claim 21 in the Office action) as anticipated by Moran. More specifically, the Office action contends that Moran teaches each recitation in claim 20 and cites the same rationale as was previously cited with respect to the rejection of claim 1. Applicants respectfully disagree.

As discussed above, Moran teaches, generally, a financial planning system that allows an advisor to take advantage of certain dependencies between input data. In particular, column 20, lines 20-52 detail a method by which a first data entry is one or more monthly expenses incurred by a person. A second data entry corresponds to a date of death of this person. Because this person is no longer going to incur monthly expenses, the monthly expenses drop to zero upon the date of death. However, this relationship between the first and second data entries is not described in Moran as adjustable or user-accessible. Additionally, the original relationship between the first and second entries in the method of Moran described above is not inputted by the user nor is this relationship able to be changed in any manner.

In contrast, claim 20 recites a user interface for receiving data for a second field of a second plan object, the data of the second field having a value linked to the data of the first field via a hierarchical relationship between the first and second objects. Thus, in the system of claim 20, a user, through the user interface, may define a relationship between the first and second objects by inputting data. In this manner, the relationship itself is adjustable as opposed to only the related data entry fields as is the case in Moran. Simply put, Moran does not teach a user interface capable of receiving input that defines a relationship between the first and second objects. Applicants submit that claim 20 is allowable over the prior art of record for at least the foregoing reasons.

Applicants respectfully submit that dependent claims 21-28, 31-33, and 37 by similar analysis, are allowable. Each of these claims depends either directly or

indirectly from claim 20 and consequently includes the recitations of independent claim 20. As discussed above, Moran fails to disclose the recitations of claim 20 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 20 noted above, each of these dependent claims includes additional patentable elements.

For example, claim 24 recites that the second field represents a date conditional on the amount represented in the first field. Nowhere in Moran is there any teaching of a field that expresses a date that is conditional on an amount. Moran discloses inputting dates such as date of death to then manipulate other fields based on the date. It is simply counter-intuitive for Moran to teach the reverse, *e.g.*, that a person may now die as soon as a savings account reaches $100,000. For at least this additional reason, applicants submit that claim 24 is allowable over the prior art of record.

Turning to the last independent claim, claim 36 recites a computer-readable medium having computer-executable instructions, comprising providing access to a limited number of objects to a user, each object having fields therein for maintaining plan information, receiving first user input information including a value associated with a first field of a first object, receiving second user input information associated with a second field of a second object, the second input information specifying a relationship of the second field with the first field, disabling at least one object, and developing a plan including running a simulation that excludes each disabled object.

The Office action rejected claim 36 as anticipated by Moran. More specifically, the Office action contends that Moran teaches each recitation in claim 36 and cites the same rationale as was previously cited with respect to the rejection of claim 1. Applicants respectfully disagree.

Once again as discussed above, Moran teaches, generally, a financial planning system that allows an advisor to take advantage of certain dependencies between input data. In particular, column 20, lines 20-52 detail a method by which a first data entry is one or more monthly expenses incurred by a person. A second data entry corresponds to a date of death of this person. Because this person is no longer going to incur monthly expenses, the monthly expenses drop to zero upon the date of death. However, this relationship between the first and second data entries is not described in Moran as adjustable or user-accessible. Additionally, the original relationship between the first and second entries in the method of Moran described above is not inputted by the user nor is this relationship able to be changed in any manner.

In contrast, claim 36 recites receiving second user input information associated with a second field of a second object, the second input information specifying a relationship of the second field with the first field. Thus, in the computer-readable medium of claim 36, a user may define a hierarchical relationship between the first and second objects by inputting data via the computer-readable medium. In this manner, the relationship itself is adjustable as opposed to only the related data entry fields as is the case in Moran. Simply put, Moran does not teach receiving input that defines a relationship between the first

and second objects. Applicants submit that claim 36 is allowable over the prior art of record for at least the foregoing reasons.

For at least these additional reasons, applicants submit that all the claims are patentable over the prior art of record. Reconsideration and withdrawal of the rejections in the Office action is respectfully requested and early allowance of this application is earnestly solicited.

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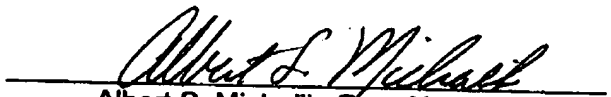
Serial No. 09/332,459

CONCLUSION

In view of the foregoing remarks, it is respectfully submitted that claims 1, 3-9, 11-28, and 31-37 are patentable over the prior art of record, and that the application is in good and proper form for allowance. A favorable action on the part of the Examiner is earnestly solicited.

If in the opinion of the Examiner a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney at (425) 836-3030.

Respectfully submitted,



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Serial No. 09/332,459

CERTIFICATE OF MAILING

I hereby certify that this Amendment along with Transmittal are being deposited with the United States Postal Service on the date shown below with sufficient postage as First Class Mail in an envelope addressed to: Commissioner for Patents, Alexandria, VA 22313-1450.

Date: April 25, 2005

Albert S. Michalik

1800 Fifth Amendment